

PARTIES

Plaintiff

Condra L. Smith

Defendants

- 1) U.S. Department of Education
- 2) Pioneer Credit Recovery
- 3) General Revenue
- 4) USA Funds C/O Navient

USA Funds c/o Navient also d.b.a Great lakes d.b.a Ascendium Education Solutions, Inc

STATEMENT OF FACTS

U.S. of Education has referred these fraudulent loans to the department of Treasury for collection by an offset of Condra L. Smith's federal (and in some cases state) tax returns. In which Condra L. Smith is asking that the offset and wage garnishment be return as part of her relief.

I am a victim of fraudulent activity while attending Indiana State University

I had a scholarship and received honors and rewards and worked while attending the university.

There are two student loans (Perkin and Stafford) that I did not authorize to be added to my account or taking out in my name.

None of this money came to me directly

- Pioneer Credit Recovery garnished my paycheck regarding this fraudulent loan.
- Pioneer Credit Recovery continued to garnish my wages even when Pioneer Credit Recovery was told to stop during an investigation
- General Revenue has sent me letters about a Stafford loan that does not have my signature(s) on the documents and have threaten to start collection of money for an unauthorized/fraudulent loan.

- USA Fund c/o Navient has garnished my paycheck without giving proof of me taking a loans(s) the paper they have regarding this Perkin loan does not have my signature or handwriting on it.
- USA Fund c/o Navient allowed Pioneer to continue to garnish my paycheck during their investigation
- US Department of Education continue help the fellow defendants with withholding my money by taking my tax refunds (IRS offset)

None of these loans/documents that go along with the loans has by hand writing or signatures. I had scholarships while attending school. Taking out loans was not necessary. I never received the money directly, nor did I authorize this activity.

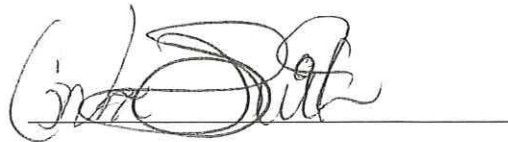
RELIEF

If you win this case, what do you want the court to order the defendant to do?

Defendants should be ordered to return all money back to plaintiff Condra L. Smith that was taken from tax returns (IRS offset) and garnishment from wages \$10,000.00

Each defendant pays additional \$10,000 each to plaintiff Condra L. Smith for damages and reimbursement of all fees pertaining to the case(filing fees, court fees, mailing fees, etc)

Respectfully Submitted



By: Condra L. Smith

3301 Lafayette St
Fort Wayne, In 46806
(260) 745-3551
Plaintiff

The undersigned hereby certifies that the foregoing **Amended Complaint** has been served upon all parties by hand delivery, facsimile transmission, electronic mail, or by mailing a copy of same by United States Mail, postage prepaid,
on this the 11th day of April 2019.

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